

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JERRY PLUMMER,)	
Plaintiff,)	Case No: 1:17-cv-05531
)	
v.)	
)	Judge Franklin U. Valderrama
POLICE OFFICER ZYDEK #5642)	
Defendant)	Mag. Judge: M. David Weisman
)	

DECLARATION OF JERRY PLUMMER

Pursuant to 18 U.S.C. § 1746, I hereby declare as follows:

1. I am over the age of 18 and if called to testify about the matters contained herein I would be competent to do so.
2. I have personal knowledge of all matters contained herein.
3. Since 1984, I have been disabled and receiving Social Security benefits.
4. During the incident, my teeth were kicked and shattered so badly that I had to have multiple teeth removed and rebuilt while incarcerated at Cook County Jail.
5. On October 3, 2017, I filed a Complaint under the Civil Rights Act, Title 42 Section 1983 U.S. Code, with the assistance of a jailhouse lawyer, while I was incarcerated at Cook County Jail.
6. Since filing the Complaint, my family and I have been victims of harassment from police officers and become fearful of retaliation.
7. Since my incarceration following the incident, I have experienced homelessness and been without access to technology on many occasions, making it increasingly difficult for me to stay updated with this lawsuit during the COVID-19 pandemic without a lawyer.

8. When the Defendant needed an extension of time to respond to discovery, due to counsel's upcoming maternity leave, I did not oppose.

9. Throughout this litigation, I was laughed at any time he attempted to get a continuance or suggested settlement to the Defendant.

10. On October 1, 2021, after requesting assistance from multiple disability lawyers, law firms and organizations, I spoke with First Defense Legal Aid attorneys to obtain assistance with this lawsuit.

11. On October 25, 2021, I signed a Limited Scope Limited Representation Agreement with First Defense Legal Aid Attorneys, specifically for legal research regarding my options for continuing with this lawsuit after the July 15, 2021 Order dismissing this case.

12. On November 29, 2020, I signed a Limited Scope Representation Agreement with First Defense Legal Aid attorneys, specifically for legal research and writing related to a Rule 60 Motion.

13. I find the incident difficult to talk about and I want to move on with my life.

14. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this, 18th day of January 2022.

/s/ JERRY PLUMMER